

C. J. A.

Executive Registry

76-9023/8

FILED

NOV 23 1976

CLERK, U. S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
BY DEPUTY

WILLIAM D. KELLER
United States Attorney
FREDERICK M. BROSI, JR.
Assistant U. S. Attorney
Chief, Civil Division
MICHAEL E. WOLFSON
Assistant U. S. Attorney
1100 United States Courthouse
312 North Spring Street
Los Angeles, Ca. 90012
Telephone: (213) 688-3551

Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHIRLEY J. SUTHERLAND,)
Plaintiff,)

v.)

No. CV 76-0947-MML

DIRECTOR H. STUART KNIGHT,)
and the UNITED STATES SECRET)
SERVICE,)
Defendant.)

SHIRLEY J. SUTHERLAND,)
Plaintiff,)

v.)

No. CV 76-0948-MML ✓

DIRECTOR GEORGE BUSH, and)
the CENTRAL INTELLIGENCE)
AGENCY,)
Defendant.)

SHIRLEY J. SUTHERLAND,)
Plaintiff,)

v.)

No. CV 76-0949-MML

DIRECTOR CLARENCE M. KELLEY,)
and the FEDERAL BUREAU OF)
INVESTIGATION,)
Defendant.)

IN CAMERA SUBMISSION OF
WITHHELD DOCUMENTS AND
MATERIALS

(Continued on Page 2)

EXECUTIVE REGISTRY

OJC

1 SHIRLEY J. SUTHERLAND,)
 2 Plaintiff,)
 3 v.) No. CV 76-0950-MML
 4 COMMISSIONER LEONARD F.)
 5 CHAPMAN, and the IMMIGRATION)
 6 AND NATURALIZATION SERVICE,)
 7 Defendants.)

 8 SHIRLEY J. SUTHERLAND,)
 9 Plaintiff,)
 10 v.) No. CV 76-0951-MML
 11 DIRECTOR REX D. DAVIS)
 12 and the BUREAU OF ALCOHOL,)
 13 TOBACCO AND FIREARMS,)
 14 Defendants.)

15 By Order of the Court, filed November 9, 1976, certain
 16 documents, held by the defendant agencies, were ordered to be
 17 submitted to the Court for in camera inspection. In accordance
 18 with said Order, all relevant documents were submitted to the
 19 Court on November 23, 1976, for in camera examination.

20 Since each of the five (5) agencies here involved in-
 21 dependently prepared their required in camera submission, each
 22 has provided the Court with an affidavit which explains what is
 23 contained in their submission, how it is organized for the Court's
 24 review, and that said documents are true and accurate copies of
 25 the materials not disclosed to plaintiff, which the Court has
 26 ordered submitted for in camera inspection. A copy of each of
 27 the agencies' affidavits is attached hereto as EXHIBITS A through
 28 E.
 29

30 It should be noted that, pursuant to the Court's Order of
 31 November 9, 1976, the in camera submission provided by each agency
 32 covers only the following FOIA exemptions:

Case No. CV 76-0947-MML (Secret Service):

Exemptions 5 and 7(E);

Case No. CV 76-0948-MML (CIA): Exemption 3;

Case No. CV 76-0949-MML (FBI): Exemptions 5 and 7(E);

Case No. CV 76-0950-MML (I&NS): Exemption 7(E);

Case No. CV 76-0951-MML (ATF): Exemption 7(E).

Any document and/or piece of information, which was withheld from disclosure, pursuant to the assertion of more than one FOIA exemption, was not included in this in camera submission if one or more of the asserted exemptions was found to be valid by the Court in its November 9, 1976, Order. In other words, the only information being here submitted in camera is information as to which one of the above-listed exemptions is being solely asserted as the basis of precluding its disclosure. Information as to which at least one exemption has already been approved by the Court has not been submitted for further examination.

Because the documents here involved have been submitted in their entirety for the Court's examination, defendants respectfully request that all documents which have been submitted be returned to counsel for defendants when no longer needed by the Court, unless the Court desires to hold the documents under seal until completion of this litigation.

DATED: November 23, 1976.

Respectfully submitted,

WILLIAM D. KELLER, United States Attorney
FREDERICK M. BROSIO, JR., Asst. U. S.
Attorney, Chief, Civil Division
MICHAEL E. WOLFSON

MICHAEL E. WOLFSON
Assistant U. S. Attorney

Attorneys for Defendants

X - 9023/T

Apr. 3 Nov 76

[illegible]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Affidavit of Shirley J. Sutherland Pursuant to Rule 56(f),
Federal Rules of Civil Procedure; Local Rule 3(g).

[illegible]

1.

1 a. Whether as a result of the search
2 defendants in fact located only five docu-
3 ments pertaining to me.

4 b. Whether each of the five documents
5 and its contents fits the characterization
6 and description given by the defendants
7 and/or is in fact exempt from disclosure
8 under §552(b).

9 c. Whether any portion of the wholly
10 undisclosed document or any further portion
11 of the other four documents is in fact
12 segregable and therefore required by
13 5 U.S.C. §552(b) to be disclosed to
14 plaintiff regardless of whether the rest
15 of said documents are otherwise exempt from
16 disclosure.

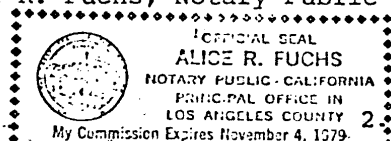
17
18 4. Knowledge of said facts is exclusively or largely within
19 and under the control of the defendants in that they have
20 custody and control of the documents sought in this case and
21 exclusive knowledge of the circumstances surrounding their
22 creation or transmission, and in that I have no independent
23 knowledge of the contents of or the circumstances surrounding
24 the creation or transmission of the said five documents and no
25 way to gain knowledge of the circumstances or contents of said
26 documents other than by means of this action.

27 Executed this 25th day of October, 1976, at Los Angeles,
28 California.

29 
Shirley J. Sutherland

30 Subscribed and sworn to before
31 me this 25th day of October, 1976.

32 
Alice R. Fuchs, Notary Public



PROOF OF SERVICE BY MAIL

I, the undersigned, certify that I am a citizen of the United States, a resident of the State of California, County of Los Angeles, over the age of 18, and not a party to the within-entitled action; my business address is 633 South Shatto Place, Los Angeles, California 90005.

On October 26, 1976, I served the within

AFFIDAVIT OF SHIRLEY J. SUTHERLAND PURSUANT TO RULE 56 (f), FEDERAL RULES OF CIVIL PROCEDURE ; LOCAL RULE 3 (g) IN OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT.

on the interested parties in said action or their attorneys by depositing a copy thereof, enclosed in a sealed envelope, with postage thereon fully prepaid, in a United States Post Office facility regularly maintained by the Government of the United States at Los Angeles, California, addressed to each of said parties or their attorneys; that the names and addresses shown on said envelopes were as follows:

William D. Keller
United States Attorney
Frederick M. Brosio, Jr.
Assistant U.S. Attorney
Attn.: Michael E. Wolfson
Assistant U.S. Attorney
United States Courthouse, 11th Fl.
312 North Spring Street
Los Angeles, California 90012

I am employed by ~~XXXXXXXXXXXXXXXXXXXXXXXXXXXX~~ a member of the bar of this Court, and a member of the State Bar of California, ~~at whose direction the service was made~~

Executed at Los Angeles, California, on October 26, 1976

Gary D. Sowards

[illegible]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NO. CV 76-0948-MML

PLAINTIFF'S STATEMENT OF GENUINE ISSUES

DIRECTOR GEORGE BUSH, and the
CENTRAL INTELLIGENCE AGENCY,

Defendants.

Statement of Genuine Issues

///

1 2. Whether each of the five documents sought herein and
2 its contents or a portion thereof fits the description of it
3 given by the defendants and/or is in fact exempt from disclosure
4 under 5 U.S.C. §552(b).

5 3. Whether each of the uncleared portions of the documents
6 described by defendants as Document Numbers 1, 2 and 5 does
7 in fact contain information which reveals intelligence sources
8 and methods in need of continued protection.

9 4. Whether nondisclosure of each of the unreleased portions
10 of Documents Numbers 1, 2 and 5 is in fact necessary to protect
11 information concerning CIA organization procedures, names,
12 official titles, and numbers of personnel employed by the Agency.

13 5. Whether the disclosure of each of the unreleased portions
14 of Document Numbers 1, 2 and 5 would in fact constitute a clearly
15 unwarranted invasion of the right to personal privacy of indivi-
16 duals named therein.

17 6. Whether the disclosure of each of the unreleased portions
18 of Documents Numbers 1, 2 and 5 would in fact breach express
19 guarantees of confidentiality and/or subject sources of informa-
20 tion to harassment or retaliation.

21 7. Whether the nondisclosure of each of the unreleased
22 portions of Document Numbers 1, 2 and 5 is in fact necessary
23 to protect the identity of a confidential source who is in a sensi-
24 tive or unique position.

25 8. Whether the disclosure of each of the unreleased por-
26 tions of Documents Numbers 1, 2 and 5, would in fact reveal
27 "intelligence sources and methods" within the meaning of
28 50 U.S.C. §403(d)(3).

29 9. Whether the disclosure of each of the unreleased por-
30 tions of Document Numbers 1, 2 and 5 would be in fact "unautho-
31 rized" within the meaning of 50 U.S.C. §403(d)(3).

32 10. Whether any further portion of Documents Numbers 1, 2

1 and 5 is in fact reasonably segregable and therefore required
2 by 5 U.S.C. §552(b) to be disclosed to plaintiff regardless of
3 whether the rest of said documents are otherwise exempt from
4 disclosure.

5 11. Whether Document Number 3 is in fact properly classi-
6 fied pursuant to the procedural and substantive criteria of
7 Executive Order 11652 and the National Security Council Direct-
8 ive governing the classification, downgrading, declassification
9 and safeguarding of National Security Information, 37 Fed. Reg.
10 10053 (May 19, 1972).

11 12. Whether the release of Document No. 3 would in fact
12 reveal the intelligence sources and methods whereby the informa-
13 tion contained therein was secured.

14 13. Whether the disclosure of the information contained
15 within Document Number 3 and upon the basis of which defendants
16 deny its release pursuant to §552(b)(6) would in fact clearly
17 constitute an unwarranted invasion of personal privacy.

18 14. Whether each of the unrel^eased portions of Document
19 Number 4 is in fact properly classified pursuant to the proce-
20 dural and substantive criteria of Executive Order 11652 and
21 the National Security Council Directive governing the Classifi-
22 cation, Downgrading, Declassification and Safeguarding of
23 National Security Information, 37 Fed. Reg. 10053 (May 19, 1972).

24 15. Whether each of the portions of Document Number 4
25 excised by defendants pursuant to §552(b)(3) in fact contains
26 and/or would reveal the organization, function, procedures,
27 names, titles and number of personnel employed by the Agency.

28 16. Whether the release of each portion of Document
29 Number 4 excised by defendants pursuant to §552(b)(6) in fact
30 would clearly constitute an unwarranted invasion of personal
31 privacy.

32 ///

1 17. Whether the disclosure of Document 3 or each of the
2 portions of Document 4 excised by defendants would in fact
3 reveal the location of a CIA field installation abroad, the
4 fact that the CIA conducts intelligence operations in a given
5 foreign country and/or reveal the identity of a sensitive intelli-
6 gence source in a given foreign country.

7 18. Whether the location of the said field installation
8 abroad, the said fact of CIA intelligence operations in a given
9 foreign country and/or the identity of said intelligence source
10 has not already been acknowledged by the United States or other-
11 wise disclosed.

12 19. Whether any portion of Document 3 or any further
13 portion of Document 4 is in fact reasonably segregable and
14 therefore required by 5 U.S.C. §552(b) to be disclosed to plain-
15 tiff regardless of whether the rest of said documents are
16 otherwise exempt from disclosure.

17
18 DATED: October 25, 1976.

19 Respectfully submitted,
20

21
22 Gary D. Sowards
23 Attorney for Plaintiff
24
25
26
27
28
29
30
31
32

PROOF OF SERVICE BY MAIL

I, the undersigned, certify that I am a citizen of the United States, a resident of the State of California, County of Los Angeles, over the age of 18, and not a party to the within-entitled action; my business address is 633 South Shatto Place, Los Angeles, California 90005.

On October 26, 1976, I served the within

PLAINTIFFS' STATEMENT OF GENUINE ISSUES

on the interested parties in said action or their attorneys by depositing a copy thereof, enclosed in a sealed envelope, with postage thereon fully prepaid, in a United States Post Office facility regularly maintained by the Government of the United States at Los Angeles, California, addressed to each of said parties or their attorneys; that the names and addresses shown on said envelopes were as follows:

William D. Keller
United States Attorney
Frederick M. Brosio, Jr.
Assistant U.S. Attorney
Attn.: Michael E. Wolfson
Assistant U.S. Attorney
United States Courthouse, 11th Fl.
312 North Spring Street
Los Angeles, California 90012

I am employed by ~~XXXXXXXXXXXXXXXXXXXXXXXXXXXX~~ a member of the bar of this Court, and a member of the State Bar of California, ~~XXXXXXXXXXXXXXXXXXXXXXXXXXXX~~

Executed at Los Angeles, California, on October 26, 1976

Gary D. Sowards

FILED

OCT 27 1976

CLERK, U. S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
DEPUTY

WILLIAM D. KELLER
United States Attorney
FREDERICK M. BROSIO, JR.
Assistant U. S. Attorney
Chief, Civil Division
MICHAEL E. WOLFSON
Assistant United States Attorney
1100 United States Courthouse
312 North Spring Street
Los Angeles, Ca. 90012
Telephone: (213) 688-3551

Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHIRLEY J. SUTHERLAND,)
Plaintiff,)
v.)
DIRECTOR H. STUART KNIGHT;)
DIRECTOR GEORGE BUSH;)
DIRECTOR CLARENCE M. KELLEY;)
COMMISSIONER LEONARD CHAPMAN;)
DIRECTOR REX D. DAVIS etc.,)
et al.,)
Defendants.)

No. CV 76-947-MML
CV 76-948-MML ✓
CV 76-949-MML
CV 76-950-MML
CV 76-951-MML

REPLY TO PLAINTIFF'S

OPPOSITION TO DEFENDANTS'

MOTIONS FOR SUMMARY JUDGMENT

On or about October 26, 1976, plaintiff filed with the Court, in the above-referenced actions, affidavits in opposition to defendants' motions for summary judgment. In her opposition affidavits, plaintiff cites neither a factual basis nor a legal basis for her opposition. She states simply that, since the defendants hold all the documents involved in these actions, she neither knows, nor can know, the contents thereof and thus cannot effectively oppose defendants' motions. Plaintiff's argument is not only entirely without merit, it constitutes a facetious attempt to have the Court litigate these actions without plaintiff having met the minimum standards of legal advocacy. In point of fact, plaintiff has not advocated her case at all, and defendants, therefore, assert that their motions for summary judgment stand as much unopposed as they would have

1 if plaintiff had filed no document in opposition at all.

2 Plaintiff's contention that she has no factual information
3 on which to base her opposition, is clearly belied by the enormous
4 amount of material provided to plaintiff in early September, 1976,
5 in conformance with the Court's Vaughn order, and the substantial
6 and detailed descriptions of withheld material contained in the
7 affidavits filed in conjunction with several of defendants' motions
8 for summary judgment. Plaintiff now has in her possession some of
9 the most thorough and detailed descriptive material covering with-
10 held documents ever to be filed in a Freedom of Information Act
11 case. Yet, she files a series of two and three-page affidavits
12 which ignore this wealth of material and the substantial case law
13 which exists in the Freedom of Information Act area, and simply
14 says -- I oppose the Government's motions and I do not have suf-
15 ficient information to argue my opposition. Her affidavits con-
16 stitute a clear affront to the Court. No other litigant who has
17 come to federal court under the Freedom of Information Act has re-
18 ceived so much detailed material from the Government and so much
19 assistance from the Court, and yet has done so little to actively
20 and completely pursue her cause. Why did the Court order Vaughn
21 indexed to be prepared and defendants comply, if it were not to
22 provide plaintiff with a basis to file her own motions for summary
23 judgment and/or oppose such motions which the defendants might file.
24 Yet, she has filed no motions of her own, and her opposition
25 pleadings consist of a simple statement that, since the Government
26 has the disputed documents in its possession, she has no basis upon
27 which to oppose defendants' motion. The absurdity of her position
28 and its affront to the judicial system is clear.

29
30 Plaintiff, in a vain attempt to create an issue where none
31 exists, points out in her affidavit in case CV 76-94-MML, that the
32 Secret Service may have FBI documents in its file and has not so

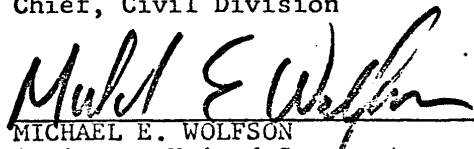
1 stated in the Service's affidavit filed with the Court on Septem-
2 ber 3, 1976. Looking at each of the five cases which the plain-
3 tiff currently has before the Court, it is clear that (1) each
4 agency has F.B.I. documents in its possession, (2) plaintiff is
5 litigating directly with the F.B.I. the release of these documents,
6 (3) the F.B.I. has withheld these documents pursuant to the exemp-
7 tions of the Freedom of Information Act and instructed all other
8 agencies to avoid disclosure of said documents, (4) that it is
9 sufficient for each agency to withhold said F.B.I. documents on
10 the basis that the F.B.I. refuses disclosure and plaintiff is
11 litigating directly with that agency, and (5) if any other basis
12 for withholding said documents by an agency other than the F.B.I.
13 is necessary, then Exemption 7(D), 5 U.S.C. §552(b)(7)(D), provides
14 such a basis since investigatory records, compiled for law enforce-
15 ment purposes in the course of a criminal investigation, are in-
16 volved, and said material was supplied to these agencies on a
17 confidential basis by a law enforcement agency (the F.B.I.).

18 Finally, it should be pointed out that plaintiff has not
19 even filed one of her nonopposition oppositions in case No. CV 76-
20 951-MML, and the Government's motion for summary judgment in that
21 case stands completely unopposed.

22 DATED: October 27, 1976.

23 Respectfully submitted,

24 WILLIAM D. KELLER
25 United States Attorney
26 FREDERICK M. BROSIO, JR.
27 Assistant United States Attorney
28 Chief, Civil Division

29 
30 MICHAEL E. WOLFSON
31 Assistant United States Attorney
32 Attorneys for Defendants

CERTIFICATE OF SERVICE BY MAIL

I, Virginia M. Molus, declare:

That I am a citizen of the United States and resident or employed in Los Angeles County, California; that my business address is Office of United States Attorney, United States Courthouse, 312 North Spring Street, Los Angeles, California 90012; that I am over the age of eighteen years, and am not a party to the above-entitled action;

That I am employed by the United States Attorney for the Central District of California who is a member of the Bar of the United States District Court for the Central District of California, at whose direction the service by mail described in this Certificate was made; that on October 27, 1976, I deposited in the United States mails in the United States Courthouse at 312 North Spring St., Los Angeles, California, in the above-entitled action, in an envelope bearing the requisite postage, a copy of REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT,

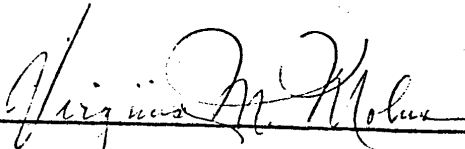
addressed to Ms. Shirley J. Sutherland
268 S. Wetherly Drive
Beverly Hills, Ca. 90212;

Gary D. Sowards, Esq.
ACLU Foundation of Southern California
633 S. Shatto Place
Los Angeles, California 90005,

at their last known address, at which place there is a delivery service by United States mail.

This Certificate is executed on October 27, 1976,
at Los Angeles, California.

I certify under penalty of perjury that the foregoing is true and correct.



Virginia M. Molus

USA-12c-240
(Rev. 10/19/67)

FILED

OCT 15 1976

CLERK, U. S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
BY DEPUTY

WILLIAM D. KELLER
United States Attorney
FREDERICK M. BROSI, JR.
Assistant U. S. Attorney
Chief, Civil Division
MICHAEL E. WOLFSON
Assistant United States Attorney
1100 United States Courthouse
312 No. Spring Street
Los Angeles, Ca. 90012
Telephone: (213) 688-3551

Executive Registry

96-90236

Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHIRLEY J. SUTHERLAND,)

Plaintiff,)

v.) No. CV 76-0948-MML

DIRECTOR GEORGE BUSH, AND)
THE CENTRAL INTELLIGENCE)
AGENCY,)

Defendants.)

- 1) NOTICE OF MOTION
- 2) MOTION FOR SUMMARY JUDGMENT
- 3) MEMORANDUM IN SUPPORT OF MOTION
FOR SUMMARY JUDGMENT

NOTICE OF MOTION

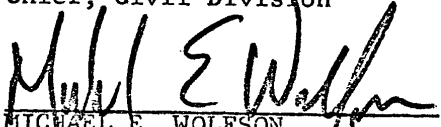
TO: PLAINTIFF, SHIRLEY J. SUTHERLAND, IN PROPRIA PERSONA,
268 S. Wetherly Drive, Beverly Hills, California 90212,
AND TO HER CO-COUNSEL, GARY D. SOWARDS, ACLU FOUNDATION
OF SOUTHERN CALIFORNIA, 633 S. Shatto Place, Los Angeles,
California 90005

YOU WILL PLEASE TAKE NOTICE that the defendants,
George Bush and the Central Intelligence Agency, will bring
on for hearing the following Motion for Summary Judgment before
the Honorable Malcolm M. Lucas, United States District Judge,
in his courtroom, United States Courthouse, 312 North Spring
Street, Los Angeles, California 90012, on Monday, November 1,
1976, at 10 A.M., or as soon thereafter as counsel may be heard.

DATED: October 15, 1976.

WILLIAM D. KELLER
United States Attorney

FREDERICK M. BROSIO, JR.
Assistant U. S. Attorney
Chief, Civil Division


MICHAEL E. WOLFSON
Assistant U. S. Attorney

Attorneys for Defendants

76-9023/2

FILED

APR 20 1976

WILLIAM D. KELLER
United States Attorney
FREDERICK M. BROSIO, JR.
Assistant U. S. Attorney
Chief, Civil Division
MICHAEL E. WOLFSON
Assistant U. S. Attorney
United States Courthouse
312 North Spring Street
Los Angeles, Ca. 90012
Telephone: (213) 688-3551

Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHIRLEY J. SUTHERLAND,

Plaintiff,

v.

DIRECTOR GEORGE BUSH, AND
THE CENTRAL INTELLIGENCE
AGENCY,

Defendants.

No. CV 76-948-MML

ANSWER TO COMPLAINTFOR INJUNCTIVE RELIEF

Responding specifically to the numbered paragraphs of
plaintiff's Complaint, defendants hereby admit, deny, and aver
as follows:

1. Paragraph 1 sets forth plaintiff's characteriza-
tion of this action, and, as such, is not an allegation of fact
for which an answer is required, but, insofar as an answer may be
deemed required, said paragraph is denied.

2. Paragraph 2 sets forth conclusions of law; if deemed
to be a statement of fact, said paragraph is denied.

3. Paragraph 3 is denied for lack of information and
knowledge sufficient to permit defendants to form a belief as to
the truth of the allegations contained therein.

4. Paragraph 4 is admitted.

- 1 -

Ed. A. - legal counsel

FILED

APR 23 1976

CLERK, U. S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
BY DEPUTY

Executive Registry

76-90231

WILLIAM D. KELLER
United States Attorney
FREDERICK M. BROSIO, JR.
Assistant U. S. Attorney
Chief, Civil Division
MICHAEL E. WOLFSON
Assistant U. S. Attorney
United States Courthouse, 11th Fl.
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 688-3551

Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHIRLEY J. SUTHERLAND,

Plaintiff,

v.

DIRECTOR GEORGE BUSH, AND
THE CENTRAL INTELLIGENCE
AGENCY,

Defendants.

No. CV 76-948-MML

DEFENDANTS' OPPOSITION
TO PLAINTIFF'S "MOTION
UNDER VAUGHN v. ROSEN"

I.

STATUS OF THE CASE

Plaintiff filed suit on March 24, 1976, under the Freedom of Information Act, 5 U.S.C. §542, asking the Court to compel defendants to produce, for the purpose of copying and inspection, all documents allegedly pertaining to plaintiff which are in the possession of the defendant agency. The Summons and Complaint in the instant action were served on the Office of the United States Attorney on March 26, 1976, necessitating an Answer to be filed no later than April 26, 1976. On April 15, 1976, plaintiff filed the instant "Motion under Vaughn v. Rosen".

/ / /

/ / /

/ / /

/ / /

MEW:vm

24 MAR 76

Executive Registry

76-9023

SHIRLEY J. SUTHERLAND
268 S. Wetherly Dr.
Beverly Hills, California
90212

Tel: (213) 276-2526
Plaintiff in Propria Persona

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHIRLEY J. SUTHERLAND,

PLAINTIFF(S)

VS

DIRECTOR GEORGE BUSH, AND
THE CENTRAL INTELLIGENCE
AGENCY,

DEFENDANT(S)

CASE NUMBER

76 9023 JTL

SUMMONS

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to serve upon

plaintiff's attorney, whose address is

SHIRLEY J. SUTHERLAND
268 S. Wetherly Dr.
Beverly Hills, California
90212

5 U.S.C. 552

an answer to the complaint which is herewith served upon you, within 30 days
after service of this summons upon you, exclusive of the day of service.
If you fail to do so, judgment by default will be taken against you for
the relief demanded in the complaint.

EDWARD M. KRITZMAN, CLERK

DATE:

24
MAR 23 1976

BY

CHRIS TARTIN
SEAL
DEPUTY CLERK

(Seal of Court)

NOTE: This summons is issued pursuant to Rule 4 of the Federal Rules of Civil Procedure. Pursuant to Rule 5(d) of the Federal Rules of Civil Procedure, all papers after the complaint required to be served upon a party shall be filed with the court either before service or within a reasonable time thereafter. Pursuant to Local Rule 4(g) of this court, the original of all documents, including exhibits to documents, shall be filed with one clear, legible copy for use by the judge.

SHIRLEY J. SUTHERLAND
268 S. Wetherly Dr.
Beverly Hills, California 90212

Tel: (213) 276-2526

Plaintiff in Propria Persona

FILED

MAR 24 1976

CLERK, U. S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
DEPUTY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHIRLEY J. SUTHERLAND,

Plaintiff, -

v.

DIRECTOR GEORGE BUSH, AND THE
CENTRAL INTELLIGENCE AGENCY,
Defendants.

76 948 CTL

NO. _____

COMPLAINT FOR INJUNCTIVE
RELIEF PURSUANT TO THE
FREEDOM OF INFORMATION
ACT

JURISDICTION

1. This is an action under the Freedom of Information Act, 5 U.S.C. Section 552, to order defendants to produce certain documents for inspection and copying, viz., any record or document containing plaintiffs' name or pertaining to plaintiff.

2. This Court has jurisdiction over this action pursuant to 5 U.S.C. Section 552 (a)(4); 28 U.S.C. Section 1361; and the First and Fifth Amendments to the United States Constitution.

PARTIES

3. Plaintiff, SHIRLEY J. SUTHERLAND, residing at 268 S. Wetherly Dr. in Beverly Hills, California 90212, is an

UNCLASSIFIED

CONFIDENTIAL

SECRET

EXECUTIVE SECRETARIAT

Routing Slip

TO:		ACTION	INFO	DATE	INITIAL
1	DCI				
2	DDCI				
3	S/MC				
4	DDS&T				
5	DDI				
6	DDA				
7	DDO				
8	D/DCI/IC				
9	D/DCI/NIO				
10	GC	✓			
11	LC				
12	IG				
13	Compt				
14	D/Pers				
15	D/S				
16	DTR				
17	Asst/DCI				
18	AO/DCI				
19					
20					
21					
22					
SUSPENSE		Date			

Remarks:

3637 (1-75)

Executive Secretary
Date

Next 3 Page(s) In Document Exempt